AUG 2 4 2022

Clerk, U.S. District Court District Of Montana Missoula

COLIN M. RUBICH Assistant U.S. Attorney U.S. Attorney's Office James F. Battin U.S. Courthouse 2601 Second Ave. N., Ste. 3200 Billings, MT 59101

Phone: (406) 247-4684 Fax: (406) 657-6989

E-mail: Colin.Rubich@usdoj.gov

ATTORNEY FOR PLAINTIFF UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

WILLIAM PETER SZLASA,

Defendant.

CR 22- 95 -BLG- SPW

INDICTMENT

FALSE STATEMENT TO A FINANCIAL INSTITUTION (Count 1)
Title 18 U.S.C. § 1014
(Penalty: 30 years of imprisonment, \$1,000,000 fine, and five years of supervised release)

AGGRAVATED IDENTITY THEFT (Count 2)
Title 18 U.S.C. § 1028A(a)(1)
(Penalty: Mandatory minimum two years of imprisonment, consecutive to any other punishment, \$250,000 fine, and one year of

supervised release)

THE GRAND JURY CHARGES:

COUNT 1

On or about August 10, 2022, at Billings, within Yellowstone County, in the State and District of Montana, the defendant, WILLIAM PETER SZLASA, knowingly made a false statement for the purpose of influencing the actions of Chase Bank, a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation. Specifically, the defendant, WILLIAM PETER SZLASA, stated his identity was John Doe 1, an existing customer of Chase Bank, and presented fraudulent identification documents in the name of John Doe 1 in order to open a new business account with the bank, when in truth and in fact, as the defendant then and there knew, he was not John Doe 1, in violation of 18 U.S.C. § 1014.

COUNT 2

On or about August 10, 2022, at Billings, within Yellowstone County, in the State and District of Montana, the defendant, WILLIAM PETER SZLASA, did knowingly use, without lawful authority, a means of identification of another

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person, during and in relation to a felony violation of 18 U.S.C. § 1014, false statement to a financial institution, as charged in count 1 above, in violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON

JESSE A. LASLOVICH

United States Attorney

CYMPEE L. PETERSON

Criminal Chief Assistant U.S. Attorney